# EXHIBIT 1

# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

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Case No. 2:15-cv-12101 Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

LANCE C. YOUNG (P51254) NEIL B. PIOCH (P67677) SOMMERS SCHWARTZ, P.C. Attorneys for Plaintiff One Towne Square, 17th Floor Southfield, MI 48076 (248) 335-0300

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# **DECLARATION OF DEBRA TEMROWSKI**

- 1. My name is Debra Temrowski.
- 2. I make this Declaration based on my personal knowledge and the books and records of Henry Ford Health System ("HFHS"). If called as a witness, I can competently testify to the facts set forth in this Declaration.

- 3. I am currently employed with HFHS as Director, Human Resources and Volunteer Services.
- 4. HFHS is a Michigan non-profit corporation, which owns and operates an extensive network of medical facilities across Southeast Michigan.
- 5. HFHS operates seven business units involved in direct patient care Henry Ford Hospital, Henry Ford Medical Group, Henry Ford Wyandotte Hospital, Henry Ford Macomb Hospital, Henry Ford West Bloomfield Hospital, Henry Ford Behavioral Health and Community Care Services.

## **Henry Ford Hospital**

- 6. Henry Ford Hospital includes at least 216 departments.
- 7. At least 271 supervisors manage the various departments at the hospital.
- 8. Within this business unit, 1,010 non-exempt employees are employed in direct patient care work within the various departments at the hospital.
- 9. Of those employees, there are a least 64 different job classifications at this hospital involved in direct patient care.

# **Henry Ford Medical Group**

10. Henry Ford Medical Group operates 41 medical centers throughout Southeast Michigan.

- 11. These medical centers provide health care from primary care to specialty care such as physical therapy or cancer treatment. Some of these medical centers include an emergency department or an ambulatory surgery center. See attached list for specific services at each site.
  - 12. Each medical center includes at least one department.
- 13. At least 460 supervisors manage the departments within these medical centers.
- 14. There are at least three job classifications within each medical center ranging from EKG Technician to Certified Registered Nurse Anesthetist.
- 15. A total of 1,190 non-exempt employees work within the various classifications at these medical centers.

# **Henry Ford Wyandotte Hospital**

- 16. Henry Ford Wyandotte Hospital includes at least 113 departments. These departments include the Center for Health Services located in Brownstown. Services include primary care, emergency, ambulatory surgery and cardiology as well diagnostic testing.
- 17. At least 86 supervisors manage the various departments at the hospital.
- 18. Within this business unit, 322 non-exempt employees are employed in direct patient care work within the various departments at the hospital.

19. Of those employees, there are a least 50 different job classifications at this hospital, ranging from Patient Sitter to Certified Registered Nurse Anesthetist.

## **Henry Ford Macomb Hospital**

- 20. Henry Ford Macomb Hospital includes at least 121 departments. These departments include several outpatient health centers. See attached list for locations and services offered.
- 21. At least 115 supervisors manage the various departments at the hospital.
- 22. Within this business unit, 403 non-exempt employees are employed in direct patient care work within the various departments at the hospital.
- 23. Of those employees, there are a least 57 different job classifications at this hospital, ranging from Patient Transportation Partner to Certified Registered Nurse Anesthetist.

# Henry Ford West Bloomfield Hospital

- 24. Henry Ford West Bloomfield Hospital includes at least 57 departments.
- 25. At least 52 supervisors manage the various departments at the hospital.
- 26. Within this business unit, 274 non-exempt employees are employed in direct patient care work within the various departments at the hospital.

27. Of those employees, there are a least 50 different job classifications at this hospital, ranging from Patient Transportation Partner to Certified Registered Nurse Anesthetist.

# Henry Ford Behavioral Health

- 28. Henry Ford Behavioral Health operates 9 locations throughout Southeast Michigan.
- 29. These locations provide behavioral health care from counseling at several outpatient counseling centers to inpatient care at Henry Ford Kingswood Hospital. It also includes Maplegrove Center that handles inpatient chemical dependency. See attached list for locations and services offered.
  - 30. Each location includes at least 1 department.
- 31. At least 33 supervisors manage those departments within these locations.
- 32. There are at least 3 job classifications within each location ranging from Patient Transportation Partner to Registered Nurse.
- 33. A total of 103 non-exempt employees work within those various classifications at these locations.

# **Community Care Services**

- 34. Henry Ford Community Care Services operates at 55 locations throughout Southeast Michigan. See attached list for locations and services offered.
- 35. These locations provide a wide variety of health services including: hospice, home health care, optometry, dialysis and pharmacy.
  - 36. Each location includes at least 1 department.
- 37. At least 114 supervisors manage the departments within these locations.
- 38. There are at least 3 job classifications within each location ranging from Dialysis Assistant to Clinical Coordinator-Oncology Services.
- 39. A total of 388 non-exempt employees work within those various classifications at these locations.

#### **HFHS Policies**

- 40. A true and accurate copy of the Henry Ford Hospital Central Sterile Reprocessing Attire Policy is attached to HFHS' brief in opposition to Plaintiff's motion for conditional class certification.
- 41. A true and accurate copy of the HFHS Surgical Attire Policy is attached to HFHS' brief in opposition to Plaintiff's motion for conditional class certification.

42. A true and accurate copy of the Henry Ford Wyandotte Hospital Attire for the Surgery Department Policy is attached to HFHS' brief in opposition

to Plaintiff's motion for conditional class certification.

43. A true and accurate copy of the Infection Control Manual Policy is

attached to HFHS' brief in opposition to Plaintiff's motion for conditional class

certification. The Infection Control Manual Policy is accessible by all HFHS

employees on the HFHS Intranet.

Discipline

A review of HFHS Human Resources records revealed no indication 44.

that any HFHS employee has ever been disciplined for a violation of the Personal

Appearance Standards, HR Policy 5.06 for failing to press or iron his or her

uniform.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the

foregoing is true and correct. Executed on:

Date: 8/27/2015

Elebra Tenrouski

9710092

#### Allen Park Rehab Medical Center

Physical Therapy Occupational Therapy

#### **Center for Athletic Medicine (CAM)**

**Physical Therapy** Sports Medicine Occupational Therapy Pulmonary Rehab

#### **Canton Medical Center**

**Internal Medicine** Family Practice Women's Health **Pediatrics** 

#### **CHASS Medical Center**

Geriatric Outreach

#### **Chrysler Clinic**

Primary Care

#### **Columbus Medical Center**

**Diabetes Education** 

Gastro Nephrology Anti-Coagulation

Ortho

Colon/Rectal Surgery Sleep Medicine

Allergy Endocrinology Oncology Infusion

**Pulmonary Medicine** Rheumatology **Internal Medicine** 

International Travel Clinic

Podiatry

Sports Medicine **Plastic Surgery MOHS Surgery** After hours care

Radiology

Physical Therapy Occupational Therapy

#### Commerce Medical Center

**Internal Medicine** Family Medicine

#### Cottage Medical Center

Geriatric Medicine

Vascular

Internal Medicine **Emergency Room** 

Infusion

Sleep Medicine Radiation Oncology Wound Clinic

Partial Hospitalization **Ambulatory Surgery** 

Pharmacy Radiology

Physical Therapy Occupational Therapy

#### **Henry Ford Hospital Clinic Building**

Allergy

Cardiovascular

Gastro

Infectious Disease

Nephrology

Hematology/Oncology

**Tumor Registry** Pulmonary Medicine

Critical Care **Internal Medicine** Geriatric Medicine

Neurology Neurosurgery

Gynecology Oncology

OB/Gynecology Ophthalmology Orthopedics Athletic Medicine

ENT - Ears, Nose, and Throat

Audiology

Speech Pathology

Pediatrics Neonatology

Radiation Oncology

Surgery Bone & Joint Urology

Clinic Trials Sleep Medicine Endo Metabolism Uro/gynecology

#### **Detroit North West Medical Center**

**Diabetes Education** Internal Medicine Family Practice OB/Gynecology **Podiatry** Same Day Radiology Physical Therapy Occupational Therapy

#### **Fairlane Medical Center**

**Diabetes Education** After Hours on Call Nurse Program Hematology/Oncology **Ambulatory Surgery** 

Allergy Cardiovascular Gastroenterology

Oncology

**Internal Medicine** Ophthalmology **Orthopedics** Athletic Medicine

Audiology

Hearing Aid Center

ENT - Ears, Nose, and Throat

Urology

Same Day Clinic **Emergency Room** 

Radiology **Breast Imaging** Occupational Therapy Gastroenterology

#### **Farmington Road Medical Center**

Dermatology **Internal Medicine** Ophthalmology **Pediatrics** 

#### Fitzgerald Health Center

Primary Care

#### Grosse Pointe Ophthalmology

Ophthalmology Vision Rehab

#### **Hamtramck Medical Center**

Geriatric Outreach Family Medicine

#### **Harbortown Medical Center**

Internal Medicine Family Medicine Radiology

#### **Henry Ford Macomb Hospital**

Pediatrics Radiation Oncology Cardiac Care Surgery

#### **Ford Road Medical Center**

Dermatology Women's Health Ophthalmology **Pediatrics** After Hours Clinic Rehab Services/Physical Therapy

#### **HF Tech Town**

Cytogenetics

#### Jefferson Medical Center

Family Medicine Anti- Coagulation Podiatry **Pediatrics** After Hours

### **Downriver Josephine Cancer Center**

Hematology/Oncology

#### **Lakeside Medical Center**

Orthopedics Podiatry **Ambulatory Surgery** Gastroenterology

Dermatology **Internal Medicine** 

**Pediatrics** 

Ob/Gynecology

Ophthalmology

Athletic Medicine

Audiology

Hearing aid center

ENT - Ears, Nose, & Throat

**General Surgery** 

Urology

Radiology

Occupational Therapy

#### **Livonia Medical Center**

**Podiatry** 

Anti-Coagulation

Radiology

**Internal Medicine** 

Ob/Gynecology

Cardiology

Ophthalmology

Vision Rehab

**Pediatrics** 

After Hours

#### **Lowell Park**

Rehabilitation Services

#### **New Center One Medical Center**

**Diabetes Education** 

**Gynecology Oncology** 

OB/Gynecology

Dermatology

IVF – Invitro fertilization

Maternal Serum Screening

Genetics

Endo Metabolism

Rheumatology

**Internal Medicine** 

Maternal Fetal

**Pediatrics** 

Physical Therapy

Occupational Therapy

#### **Novi Medical Center**

Family Medicine

Center for Integrative Medicine

Physical Therapy

#### **Pierson Medical Center**

Cardiovascular Medicine

Nephrology/Hypertension

**Internal Medicine** 

Ob/Gynecology

Ears, Nose, & Throat

**Pediatrics** 

Center for Autism

Surgery - Colon & Rectal, Plastics

#### Plymouth Medical Center

Dermatology

**Internal Medicine** 

Family Medicine

Radiology

#### **Quick Care Woodward**

Primary Care

#### Somerset Medical Center

IVF - Invitro Fertilization

#### Royal Oak Medical Center

Family Medicine

Ob/Gvnecology

**Pediatrics** 

#### **Southfield Medical Center**

Internal Medicine

Family Practice

**Pediatrics** 

Physical Therapy

#### St. Joe's Pontiac Hospital

Pediatrics Neonatal

#### **Sterling Heights**

**Diabetes Education** 

Vascular

**Emergency Room** 

Anti-Coagulation

Allergy

Cardiology

**Pulmonary** Rheumatology **Internal Medicine** Podiatry **Pediatrics** Same Day Clinic Radiology

#### **Taylor Medical Center**

**Diabetes Education** Dermatology Anti-Coagulation Cardiovascular Medicine Gastroenterology **Pulmonary** Rheumatology **Internal Medicine** Neurology Ob/Gynecology Ophthalmology **Pediatrics General Surgery** Radiology

#### **Troy Medical Center**

Bone Density Dermatology Family Medicine Neurology Ob/Gynecology **Pharmacy** 

#### **Warren Medical Center**

**Family Practice** 

#### **West Bloomfield Medical Center**

**Cancer Management** Cardiovascular Health Enhancement Center Nephrology Neurology Orthopedics Anti -Coagulation Gastroenterology **Pulmonary** Rheumatology Geriatric Medicine

**Neuro Surgery** OB/Gynecology ENT - Ears, Nose, & Throat Urology Audiology Hearing Aid Center Rad Oncology General Surgery Vein Clinic Uro gynecology

#### **Woodhaven Medical Center**

**Plastics Internal Medicine** Family Med **Podiatry** Radiology

#### **Henry Ford Wyandotte Hospital**

Cardiovascular General Surgery Neurosurgery

### Hospitals

Henry Ford Macomb Hospital 15855 19 Mile Road Clinton Township, MI, 48038

Henry Ford Macomb Hospital – Mt. Clemens 215 North Ave. Mt. Clemens, MI, 48043

#### **Health Centers**

Bruce Township 80650 Van Dyke Romeo, MI, 48065

Chesterfield Township 30795 23 Mile Road Chesterfield Township, MI, 48047

Fraser 15717 15 Mile Road Clinton Township, MI, 48035

Richmond 31505 32 Mile Road Richmond, MI, 48062

Shelby Township (Inside the Shelby Macomb Medical Mall) 50505 Schoenherr Shelby Township, MI, 48316

Washington Township (Inside the Orchardview Medical Complex) 12150 30 Mile Road Washington, MI, 48095

# Cardiac and Pulmonary Rehabilitation

15400 19 Mile Road, Suite 145 Clinton Township, MI, 48038

# Sleep Medicine Center

15945 19 Mile Road, Suite 105B Clinton Township, MI, 48038

#### **Rehabilitation Services**

Clinton Township 16301 19 Mile Road Clinton Township, MI, 48038

Fraser (Traditional and Sports Medicine) 15595 15 Mile Road Clinton Township, MI, 48035

Warren 13251 E. 10 Mile Road, Suite 400 Warren, MI, 48089

# Weight Management

Shelby Township (In the Health Center) 50505 Schoenherr, Suite 020 Shelby Township, MI, 48316 Services also available at the Chesterfield Health Center.

# Wellspring Services

43421 Garfield, Suite 8 Clinton Township, MI, 48038

#### Wound Care & Consultation Centers

Chesterfield – includes Ostomy Clinic (In the Health Center) 30795 23 Mile Road Chesterfield Township, MI, 48047

Clinton Township 15520 19 Mile Road, Suite 400 Clinton Township, MI, 48038 (586) 228-6220

#### Henry Ford Behavioral Health Services Locations

#### **Henry Ford Maplegrove Center**

#### 6773 West Maple Road

#### West Bloomfield, MI 48322

Specializing in treatment for alcohol and chemical dependency.

#### **Henry Ford Kingswood Hospital**

10300 W. 8 Mile Road

#### Ferndale, MI 48220

Expert psychiatric inpatient care for children, teens & adults.

#### **Clinton Township Outpatient Services**

15420 19 Mile Road

#### Clinton Township, MI 48038

Outpatient psychiatric services, psychotherapy and pharmacotherapy. Specialists in depression, anxiety, addictions, parenting, eating disorders, grief and loss, codependency, behavioral problems, ADHD, obesity, substance.

# **Columbus Center Novi Outpatient Services**

39450 12 Mile Road, Suite 2B

#### Novi, MI 48377

Outpatient psychiatric service, psychotherapy and pharmacotherapy. Specialists in depression, bipolar disorder, anxiety, gambling, dual diagnosis (substance abuse and co-morbid psychiatric disorders), parenting, eating disorders, psychotic disorders, dementia evaluation, obesity, geriatric psychiatry, forensic evaluation.

#### **Dearborn Outpatient Services**

#### 5111 Auto Club Drive, Suite 112

Outpatient psychiatric services, psychotherapy and pharmacotherapy for adults, children, adolescents and the elderly. Specialists in depression, bipolar disorder, anxiety, PTSD, pain management, dual diagnosis (substance abuse and co-morbid psychiatric disorders), parenting, psychotic disorders, geriatric psychiatry, dementia evaluation, forensic evaluation, obesity, substance abuse).

#### **Detroit Outpatient Services**

#### One Ford Place, Suite 1C

#### Detroit, MI 48202

Outpatient psychiatric services, psychotherapy and pharmacotherapy. Specialists in depression, bipolar disorder, anxiety, PTSD, pain management, dual diagnosis (substance abuse and co-morbid psychiatric disorders), psychotic disorders, geriatric psychiatry, demetia evaluation, forensic evaluation, obesity, substance abuse.

#### **Troy Outpatient Services**

#### 2825 Livernois, Second Floor

#### Troy, MI 48083

Outpatient psychiatric services, psychotherapy and parmacotherapy. Specialists in depression, anxiety, gambling, addictions, parenting, eating disorders, obesity, substance abuse.

**Dialysis Locations** 

Corporate Office

25664 Lahser Rd.

30100 Telegraph Road, Suite 200 Bingham Farms, MI 48025

Southfield, MI 48033-5810

Eastpointe Dialysis Center

Northwest Detroit Dialysis Center -

Northwest Detroit Dialysis Center - Lahser

Northland Park

21400 Kelly Road

Eastpointe, MI 48021

21000 Northwestern Hwy. Southfield, MI 48075-5306

Fairlane Dialysis

Southeastern Michigan Kidney Center

19001 Hubbard Drive Dearborn, MI 48126

CAPD & Home Program

1695 W. 12 Mile Rd. Suite, #250

Berkley, MI 48072

Henry Ford Hospital High Acuity Dialysis

St. Joseph Dialysis

2799 W. Grand Blvd. Detroit, MI 48202

900 Woodward Ave.

Pontiac, MI 48341

Home Program

St. Mary Dialysis

2799 W. Grand Blvd. Detroit, MI 48202

14555 Levan

Livonia, MI 48154

Macomb Regional Dialysis Centers, LLC

**Taylor Dialysis** 

16151 19 Mile Rd., Suite 200

24565 Haig Road

Taylor, MI 48180

Northwest Detroit Dialysis Center

Clinton Township, MI 48038-1158

**Troy Dialysis** 

7800 W. Outer Drive Detroit, MI 48235

2050 Livernois

Troy, MI 48083

West Pavilion Dialysis

2799 W. Grand Blvd. Detroit, MI 48202

**Henry Ford at Home Locations** 

Henry Ford at Home – Macomb

15855 19 Mile Rd.

Clinton Township, MI, 48038

Henry Ford at Home - West Bloomfield

6777 W. Maple Road

West Bloomfield, MI 48322

Henry Ford at Home - Wyandotte

2333 Biddle Avenue Wyandotte, MI 48192

**Hospice Locations** 

**Community Teams** 

Henry Ford Hospital

2799 W. Grand Blvd. Detroit, MI 48202

Macomb

16931 19 Mile Road, Suite 140 Clinton Twp., MI 48038

Oakland

30200 Telegraph Rd., Suite 121 Bingham Farms, MI 48025

Wayne

17333 Federal Drive, Suite 260

Allen Park, MI 48101

Children's Services

SandCastles (grief support for children and

families)

One Ford Place, Suite 4A

Detroit, MI 48202

**Nursing Home Services** 

**Nursing Home Services** 

655 W. 13 Mile Road, 1st Floor Madison Heights, MI 48071

**Residence Location** 

The Lakeland Center 26900 Franklin Road Southfield, MI 48034

**Occupational Health Locations** 

Henry Ford Medical Center - Woodhaven

22505 Allen Rd.

Woodhaven, MI 48183

Occupational Health at Harbortown

3384 E. Jefferson Detroit, MI 48207

OptimEyes Locations	0	otimEv	ves	Locations
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Dearborn Super Vision Center

5500 Auto Club Drive Dearborn, MI 48126

Lakeside Super Vision Center

44987 Schoenherr Road Sterling Heights, MI 48313.

Roseville Super Vision Center

32600 Gratiot Roseville, MI 48066

Taylor - Downriver Super Vision Center

22395 Eureka Road Taylor, MI 48180

Troy Super Vision Center

735 John R Road Troy, MI 48083

West Bloomfield Super Vision Center

6530 Farmington Road West Bloomfield, MI 48322

Westland Super Vision Center

35184 Central City Parkway Westland, MI 48185 Chesterfield

27903 23 Mile Rd. Chesterfield, MI 48051

Detroit (West Grand Blvd.) 2799 West Grand Blvd. Detroit, MI 48202

Detroit (West Outer Dr.) 7800 West Outer Drive Detroit, MI 48235

Detroit (Renaissance Center)

400 Renaissance Center Detroit, MI 48235

**Farmington Hills** 

38487 West 10 Mile Road Farmington Hills, MI 48335

**Grosse Pointe Park** 

15401 East Jefferson Grosse Pointe Park, MI 48230

Lake Orion

684 South Lapeer Road Lake Orion, MI 48362

Milford

516 Highland Avenue Milford, MI 48381

Fort Gratiot, MI 48059

Shelby Twp., MI 48316

**Pharmacy Locations** 

Monroe Henry Ford Health Center – Brownstown

23050 West Rd. 504 N. Telegraph Road

Brownstown Twp., MI, 48183 Monroe, MI 48162

Henry Ford Medical Center – Canton

Port Huron 6100 Haggerty Rd.

Canton, MI, 48187 4355 24th Avenue,

Henry Ford Medical Center – Fairlane

Shelby Township 19401 Hubbard Dr.

Dearborn, MI, 48126 2025 25 Mile Road

Henry Ford Medical Center - Ford Road Southfield

Henry Ford Medical Center - New Center

5500 Auto Club Drive 30800 Southfield Road Dearborn, MI, 48126

Southfield, MI 48076

One (Detroit)

3031 West Grand Blvd. Suite 800, Detroit, MI, 48202

Henry Ford Hospital - Lobby and 15th Floor

Henry Ford Medical Center - Detroit 2799 W. Grand Blvd. Northwest Detroit, MI, 48202

7800 West Outer Drive Henry Ford Macomb Hospital

Detroit, MI, 48235 15855 19 Mile Rd.

One Ford Place Clinton Township, MI, 48038

1 Ford Place Henry Ford West Bloomfield Hospital

Detroit, MI, 48202 6777 W. Maple Road

Henry Ford Medical Center - Pierson West Bloomfield, MI 48322

131 Kercheval Ave.

Henry Ford Wyandotte Hospital Grosse Pointe Farms, MI, 48236

2333 Biddle Avenue Henry Ford Medical Center - Livonia Wyandotte, MI 48192

#### 5 Henry Ford Community Care Services Locations

29200 Schoolcraft Rd. Livonia, MI, 48150

Henry Ford Macomb Health Center -Chesterfield

30795 23 Mile Rd. Chesterfield Township, MI, 48047

Henry Ford Medical Center - Columbus (Novi)

39450 W. 12 Mile Rd. Novi, MI, 48377

Henry Ford Medical Center - Plymouth

14300 Beck Rd. Plymouth, MI, 48170

Henry Ford Medical Center - Southfield

22777 W. Eleven Mile Rd. Southfield, MI, 48034

Henry Ford Medical Center - East Jefferson

24725 E. Jefferson Ave. St. Clair Shores, MI, 48080

Henry Ford Medical Center - Sterling Heights

3500 15 Mile Rd. Sterling Heights, MI, 48310

Henry Ford Medical Center - Lakeside (Sterling Heights)

14500 Hall Rd. Sterling Heights, MI, 48313

Henry Ford Medical Center - Taylor

24555 Haig Rd. Taylor, MI, 48180 Henry Ford Medical Center - Troy

2825 Livernois Troy, MI, 48083

Henry Ford Medical Center - Farmington Road

6530 Farmington Rd. West Bloomfield, MI, 48322

Henry Ford Medical Center – Woodhaven

22505 Allen Rd. Woodhaven, MI, 48183